UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

JENNIFER VANDERSTOK, et al.,	§	
	§	
Plaintiffs,	§	
	§	
BLACKHAWK MANUFACTURING	§	
GROUP INC. d/b/a 80 Percent Arms,	§	
,	§	
Intervenor-Plaintiff,	§	
,	§	
DEFENSE DISTRIBUTED, and	§	
THE SECOND AMENDMENT	§	Civil Action No. 4:22-cv-00691-O
FOUNDATION, INC.	§	
,	§	
Intervenors-Plaintiffs,	§	
,	§	
v.	§	
••	§	
MERRICK GARLAND, in his Official	§	
Capacity as Attorney General of the	\$ §	
United States, et al.,	\$ §	
omica sauce, et ais,	8 §	
Defendents	2	

Defendants.

DEFENSE DISTRIBUTED AND THE SECOND AMENDMENT FOUNDATION, INC.'S MOTION FOR A PRELIMINARY INJUNCTION

Defense Distributed and the Second Amendment Foundation, Inc. ("SAF") move for a preliminary injunction that parallels the preliminary injunctions already ordered with respect to Plaintiff Tactical Machining, LLC, Docs. 56, 84, 91, and Intervenor-Plaintiff BlackHawk Manufacturing Group Inc. d/b/a 80 Percent Arms, Doc. 118. For Defense Distributed and SAF, the Court should issue an order—either a new injunction order or an order expanding the scope of its existing injunction—preliminarily enjoining the Defendants from enforcing the challenged redefinition of "firearm" in 27 C.F.R. §§ 478.11 and 27 C.F.R. §§ 478.11, see Definition of "Frame

or Receiver" and Identification of Firearms, 87 Fed. Reg. 24,652 (Apr. 26, 2022), against Defense Distributed, its customers, and SAF's members. A brief and evidence support this motion.

The motion is opposed.

Date: January 12, 2023 Respectfully submitted,

/s/ Chad Flores
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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defense Distributed and the Second Amendment Foundation, Inc. conferred with Defendants' counsel on December 19, 2022. Because the parties did not reach an agreement, this motion is opposed.

/s/ Chad Flores Chad Flores